

**Iowa Department of Natural Resources
Title V Operating Permit**

**Name of Permitted Facility: Bertch Cabinet Manufacturing Inc./
Oasis Facility**

Facility Location: 4747 Crestwood Drive, Waterloo, IA. 50704

Air Quality Operating Permit Number: 03-TV-026

Expiration Date: August 24, 2008

EIQ Number: 92-0712

Facility File Number: 07-01-063

Responsible Official

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Title: President

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This permit is issued in accordance with 567 Iowa Administrative Code Chapter 22, and is issued subject to the terms and conditions contained in this permit.

For the Director of the Department of Natural Resources

Douglas A. Campbell, Supervisor of Air Operating Permits Section

Date

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Abbreviations

acfm	actual cubic feet per minute
CFR	Code of Federal Regulation
Cf/hr	cubic feet per hour
°F	degrees Fahrenheit
EIQ	emissions inventory questionnaire
gal./yr	gallons per year
gr./dscf	grains per dry standard cubic foot
gr./100 cf	grains per one hundred cubic feet
IAC	Iowa Administrative Code
IDNR	Iowa Department of Natural Resources
MMCF/hr	million cubic feet per hour
MVAC	motor vehicle air conditioner
NESHAP	National Emission Standards for Hazardous Air Pollutants
NSPS	new source performance standard
ppmv	parts per million by volume
lb./hr	pounds per hour
lb./MMBtu	pounds per million British thermal units
scfm	standard cubic feet per minute
SIC	Standard Industrial Classification
TPY	Tons per year
USEPA	United States Environmental Protection Agency
wt%	weight percent

Pollutants

PM	particulate matter
PM ₁₀	particulate matter ten microns or less in diameter
SO ₂	sulfur dioxide
NO _x	nitrogen oxides
VOC	volatile organic compound
CO	carbon monoxide
HAP	hazardous air pollutant

I. Facility Description and Equipment List

Facility Name: Bertch Cabinet Manufacturing Inc./ Oasis Facility

Permit Number: 03-TV-026

Facility Description: Manufacture of Composite Sinks (SIC 3088)

Equipment List

Emission Point Number	Associated Emission Unit Number(s)	Associated Emission Unit Description
EP-OAS-001	EU-OAS-001	Gel Coat Booth
EP-OAS-006	EU-OAS-008	Gel Coat Booth
EP-OAS-004	EU-OAS-006	Resin Storage Tank
EP-OAS-005	EU-OAS-007	Resin Storage Tank
EP-OAS-009	EU-OAS-003	Casting Machine
EP-OAS-010	EU-OAS-010	Casting Machine
EP-OAS-020	EU-OAS-020	Casting Machine
EP-OAS-018	EU-OAS-018	Mold Sealer Fugitives
EP-OAS-019	EU-OAS-019	Mold Sealer Fugitives

Insignificant Equipment List

Insignificant Emission Unit Number	Insignificant Emission Unit Description
EU-OAS-002	Gel Coat Oven (Natural Gas Fired-0.42 MMBtu/hr)
EU-OAS-002	Post Cure Oven (Natural Gas Fired-0.42 MMBtu/hr)
EU-OAS-009	Gel Coat Oven (Natural Gas Fired-0.42 MMBtu/hr)
EU-OAS-011	Post Cure Oven (Natural Gas Fired-0.42 MMBtu/hr)
EU-OAS-012	Natural Gas Fired Space Heater (4 MMBtu/hr)
EU-OAS-013	Natural Gas Fired Space Heater (4 MMBtu/hr)
EU-OAS-014	Natural Gas Fired Space Heater (4 MMBtu/hr)
EU-OAS-015	Natural Gas Fired Space Heater (4 MMBtu/hr)
EU-OAS-016	Natural Gas Fired Space Heater (4 MMBtu/hr)
EU-OAS-017	Natural Gas Fired Space Heater (4 MMBtu/hr)
EU-OAS-021	Grinding Booth
EU-OAS-022	Grinding Booth
EU-OAS-023	Air Makeup Unit (Natural Gas Fired-2.16 MMBtu/hr)
EU-OAS-024	Air Makeup Unit (Natural Gas Fired-4 MMBtu/hr)
EU-OAS-025	Air Makeup Unit (Natural Gas Fired-2.16 MMBtu/hr)
EU-OAS-026	Sanding Machine

II. Plant-Wide Conditions

Facility Name: Bertch Cabinet Manufacturing/ Oasis Facility
Permit Number: 03-TV-026

Permit conditions are established in accord with 567 Iowa Administrative Code rule 22.108

Permit Duration

The term of this permit is: Five (5) years
Commencing on: August 25, 2003
Ending on: August 24, 2008

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

Emission Limits

Unless specified otherwise in the Source Specific Conditions, the following limitations and supporting regulations apply to all emission points at this plant:

Opacity (visible emissions): 40% opacity
Authority for Requirement: 567 IAC 23.3(2)"d"

Sulfur Dioxide (SO₂): 500 parts per million by volume
Authority for Requirement: 567 IAC 23.3(3)"e"

Particulate Matter(state enforceable only)¹:

No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas, except as provided in 567 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – Chapter 24.

For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B).

Authority for Requirement: 567 IAC 23.3(2)"a"(as revised 7/21/1999)

¹ This is the current language in the Iowa Administrative Code (IAC). This version of the rule is awaiting EPA approval to become part of Iowa's State Implementation Plan (SIP). When EPA approves this rule, it will replace the older version and will be considered federally enforceable.

Particulate Matter (federally enforceable)²:

The emission of particulate matter from any process shall not exceed the amount determined from Table I, except as provided in 567 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – Chapter 24. If the director determines that a process complying with the emission rates specified in Table I is causing or will cause air pollution in a specific area of the state, an emission standard of 0.1 grain per standard cubic foot of exhaust gas may be imposed.

Authority for Requirement: 567 IAC 23.3(2)"a" (prior to 7/21/1999)

Fugitive Dust: Attainment and Unclassified Areas - No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved public roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance, as defined in Iowa Code section 657.1, from becoming airborne. All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule.

Reasonable precautions may include, but not limited to, the following procedures.

1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizers or limestone.
4. Covering at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.

Authority for Requirement: 567 IAC 23.3(2)"c"

² This is the current language in the Iowa SIP, and is enforceable by EPA.

Compliance Plan

The owner/operator shall comply with the applicable requirements listed below. The compliance status is based on information provided by the applicant.

Unless otherwise noted in Section III of this permit, Bertch Cabinet Manufacturing Inc./Oasis Facility is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which become effective during the permit term, Bertch Cabinet Manufacturing Inc./Oasis Facility shall comply with such requirements in a timely manner.

Authority for Requirement: 567 IAC 22.108(15)

NESHAP Limits and Requirements:

The owner or operator of this equipment shall comply with the operational limits and requirements listed below.

Terms and Conditions: The Permittee shall comply with all applicable requirements of 40 CFR 63 Subpart WWW - National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production and Subpart A – General Conditions.

Compliance Dates

Facilities meeting a organic HAP emissions standard based on a 12-month rolling average must begin collecting data on April 21, 2006.

- 40 CFR 63.5800

Standards

A. The permittee must meet the requirements of paragraphs a) through c) below.

- a) If the permittee has an existing facility that does not have any centrifugal casting or continuous lamination/casting operations, or an existing facility that does have centrifugal casting or continuous lamination/casting operations, but the combination of all centrifugal casting and continuous lamination/casting operations emit less than 100 tpy of HAP, the permittee must meet the annual average organic HAP emissions limits in Table 3 and the applicable work practice standards in Table 4.
- b) If the facility subsequently meets or exceeds the 100 tpy threshold in any calendar year, the permittee must notify the permitting authority in their compliance report. The permittee may at the same time request a one-time exemption from the requirements for facilities emitting 100 or more tpy of HAP in the compliance report if all of the following can be demonstrated:
 - (1) The exceedance of the threshold was due to circumstances that will not be repeated.
 - (2) The average annual organic HAP emissions from the potentially affected operations for the last 3 years were below 100 tpy.
 - (3) Projected organic HAP emissions for the next calendar year are below 100 tpy, based on projected resin and gel coat use and the HAP emission factors calculated according to the procedures of 40 CFR 63.5799.
- c) If the permittee applies for an exemption in b), above, and subsequently exceeds the HAP emission thresholds specified in a), above, over the next 12-month period, they must notify the permitting authority in their semi-annual report, the exemption is removed, and the

permittee must comply with paragraphs (b) or (d) or 40 CFR 63.5805 within 3 years from the time organic HAP emissions first exceeded the threshold.

- 40 CFR 63.5805

Options for Meeting Standards

A. The permittee must use one of the following methods in paragraphs a) through c), below, to meet the standards listed under Standards, above. When the permittee is complying with an emission limit in Table 3. The permittee may use any control method that reduces any organic HAP, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, covered curing techniques, and routing part or all emissions to an add-on control. The necessary calculations must be completed within 30 days after the end of each month. The permittee may switch between the compliance options in paragraphs a) through c) of this section. When the permittee changes to an option based on a 12-month rolling average, the average must be based on the previous 12 months of data calculated using the compliance option currently used unless the compliant materials option in paragraph c) of this section was being used. In this case, the permittee must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

a) *Meet the individual organic HAP emissions for each operation.*

The permittee must demonstrate that they meet the individual organic HAP emissions limits for each applicable molding operation listed in Table 3. This is done in two steps. First, determine an organic HAP emissions factor for each individual gel coat, application method, and control method used in a particular operation. Second, calculate for each particular operation type, a weighted average of those organic HAP emissions factors based on resin and gel coat use. The calculated HAP emissions factor must either be at or below the applicable HAP emissions limit in Table 3 based on a 12-month rolling average. Use the procedures described in paragraphs a) (1) through (3) of this section to calculate average organic HAP emissions factors for each operation.

(1) Calculate the actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following three characteristics vary: The neat gel coat plus organic HAP content, the application technique, or the control technique. Organic HAP emissions factors must be calculated for each different process stream by using the appropriate equations in Table 1 of Appendix A for open molding or from site-specific organic HAP emissions factors based on actual site HAP emissions test data incorporated into the Title V Permit. If vapor suppressants are used to meet the organic HAP emissions limit for open molding, the vapor suppressant effectiveness must be determined by conducting testing according to the procedures specified in Appendix A to Subpart WWW of 40 CFR 63. If an add-on control device is used to meet the organic HAP emissions limit, the add-on control factor must be determined by conducting capture and control efficiency testing using the procedures specified in 40 CFR 63.5850. The organic HAP emissions factor calculated from the equations in Table 1, or site-specific emissions factors, is multiplied by the add-on control factor to calculate the organic HAP emissions factor after control. Equation 1, below, should be used to calculate the add-on control factor used in the organic HAP emissions factor equations.

$$\text{Add-on Control Factor} = 1 - \% \text{ Control Efficiency} / 100 \quad (\text{Eq. 1})$$

Where:

Percent Control Efficiency = a value calculated from organic HAP emissions test measurements made according to the requirements of 40 CFR 63.5850.

- (2) Calculate the actual operation organic HAP emissions factor for the last 12 months for open molding operation type by calculating the weighted average of the individual process stream organic HAP emissions factors within each respective operation. To do this, sum the product of each individual organic HAP emissions factor calculated in paragraph a)(1) of this section and the amount of neat gel coat plus usage that correspond to the individual factors and divide the numerator by the total amount of neat gel coat plus used in that operation type. Use Equation 2 below to calculate the actual organic HAP emissions factor for each open molding operation type.

$$\text{Actual Operation Organic HAP Emission Factor} = \frac{\sum_{i=1}^n (\text{Actual Process Stream EF}_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 2})$$

Where:

Actual Process Stream EF_i = actual organic HAP emissions factor for process stream i , lbs/ton

Material_i = neat resin plus neat gel coat plus used during the last 12 calendar months for process stream i , tons

n = number of process streams where you calculated an organic HAP emissions factor.

- (3) Compare each organic HAP emissions factor calculated in paragraph b)(2) of this section with its corresponding organic HAP emissions limit in Table 3. If all emissions factors are equal to or less than their corresponding emission limits, then the facility is in compliance.

b) *HAP Emissions Factor Averaging Option*

Demonstrate each month that each applicable weighted average of the organic HAP emissions limits in Table 3 is met. When using this option, compliance must be demonstrated with the weighted average organic HAP emissions limit for all open molding operations.

- (1) Each month calculate the weighted average organic HAP emissions limit for all open molding operations for the facility for the last 12-month period to determine the organic HAP emissions limit which must be met. To do this, multiply the individual organic HAP emissions limits in Table 3 for each open molding operation type by the amount of neat gel coat plus used in the last 12 months for each open molding operation type, sum these results, and then divide this sum by the total amount of neat gel coat plus used in open molding over the last 12 months.

Use equation 3, below, to calculate the weighted average organic HAP emissions limit for all open molding operations.

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^n (EL_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 3})$$

Where:

EL_i = organic HAP emissions limit for operation type i, lbs/ton, from Table 1 of Appendix A.

Material_i = neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons.

n = number of operations.

- (2) Each month calculate the actual weighted average organic HAP emissions factor for open molding. To do this, multiply your actual open molding operation organic HAP emissions factor and the amount of neat gel coat plus used in each open molding operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding operations. Actual individual HAP emissions factors for each operation type must be calculated as described in paragraphs a)(1) and (2), above. Use Equation 4, below, to calculate the actual weighted average organic HAP emissions factor.

$$\text{Actual Weighted Average Organic HAP Emission Factor} = \frac{\sum_{i=1}^n (\text{Actual Operation } EF_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 4})$$

Where:

Actual Operation EL_i = Actual organic HAP emissions factor for operation type i, lbs/ton,

Material_i = neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons.

n = number of operations.

- (3) Compare the values calculated in paragraphs b)(1) and (2), above. If each 12-month

rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then the facility is in compliance.

- c) Use gel coats that do not exceed the maximum organic HAP contents shown in Table 3.
 - 40 CFR 63.5810

General Compliance Requirements

- A. The permittee must be in compliance at all times with the work practice standards in Table 4 as well as the organic HAP emissions limits in Table 3.
 - 40 CFR 63.5835
- B. Open molding operations that elect to meet a organic HAP emissions limit on a 12-month rolling average must initiate collection of the required data on April 21, 2006 and demonstrate compliance by April 21, 2007.
 - 40 CFR 63.5840
- C. Initial compliance with each applicable organic HAP emissions standard listed under Standards, above, shall be demonstrated by using the procedures shown in Tables 8 and 9.
 - 40 CFR 63.5860

Continuous Compliance Requirements

- A. Records must be kept of gel coat use, organic HAP content, and operation where the gel coat is used if any organic HAP emission limits are being met based on organic HAP emissions limits in Table 3.
- B. If it is initially demonstrated that all gel coats individually meet the applicable organic HAP emissions limits, or organic HAP content limits, then gel coat records are not required. However, a statement in each compliance report that all gel coats still meet the organic HAP limits for compliant gel coats shown in Table 3 is required. If after this initial demonstration the permittee changes to a higher organic HAP gel coat, or increases the gel coat organic HAP content, or changes to a higher-emitting gel coat application method, then a demonstration that all gel coats still meet the applicable organic HAP emission limits is required, or gel coat use records must be collected and compliance calculated on a 12-month rolling average.
 - 40 CFR 63.5895
- C. Compliance with organic HAP emissions is demonstrated by maintaining a organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 3 on a 12-month rolling average, or by including in each compliance report a statement that all gel coats meet the appropriate organic HAP emissions limits as discussed above.
- D. Compliance with the work practice standards in Table 4 is demonstrated by performing the work practice required for the operation.
- E. The permittee must report each deviation from each applicable standard listed under Standards, above. The deviations must be reported according to the requirements listed under Notifications, Reports, and Records, below.
- F. During periods of startup, shutdown or malfunction, the applicable organic HAP emissions limits and work practice standards must be met.
 - 40 CFR 63.5900

Notifications, Reports, and Records

- A. All of the applicable notifications in Table 13 of 40 CFR 63 Subpart WWWW must be submitted by the dates specified.
- B. If any information submitted in any notification is changed, the changes must be submitted in writing to the Administrator within 15 calendar days after the change.
- C. Each applicable report in Table 14 of 40 CFR 63 Subpart WWWW must be submitted.
- D. Unless the Administrator has approved a different schedule for submission of reports under 40 CFR 63.10(a), each report must be submitted by the date shown in Table 14 of 40 CFR 63 Subpart WWWW. The first report shall be submitted by September 30, 2006 and subsequent reports by March 31 and September 30 covering the periods of July 1 to December 31 and January 1 to June 30, respectively.
- E. The compliance report must contain the information listed in 1) to 4) below.
 - 1) Company name and address.
 - 2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
 - 3) Date of the report and beginning and ending dates of the reporting period.
 - 4) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to the facility, and there are no deviations from the requirements for work practice standards in Table 2 of Appendix A, a statement that there were no deviations from the organic HAP emissions limitations or the work practice standards during the reporting period.
- F. For each deviation from a organic HAP emission limitation (*i.e.*, emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs the compliance report must contain the information in E. 1) through 3) of this section and F. 1) and 2), below. This includes periods of startup, shutdown, and malfunction.
 - 1) The total operating time of each affected source during the reporting period.
 - 2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
- G. The permittee must report if the 100 tpy organic HAP threshold has been exceeded. Included with this report must be any request for an exemption under Standards A. b), above. If an exemption has been previously received and the 100 tpy organic HAP emissions threshold subsequently exceeded, this exceedance must be reported as required in Standards A. c), above.
- H. Each affected source that has obtained a Title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 71.6 (a)(3)(iii)(A). If an affected source submits a report pursuant to Table 14 of 40 CFR 63 Subpart WWWW along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 71.6 (a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement of 40 CFR Subpart WWWW, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.
- I. Submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in Table 14 of 40 CFR 63 Subpart WWWW, and not based on the requirements in 40 CFR 63.999.

- 40 CFR 63.5910

- J. The permittee shall keep all records listed in 1) through 3) below
- 1) A copy of each notification and report that is submitted to comply with 40 CFR 63 Subpart WWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that is submitted according to the requirements of 40 CFR 63.10(b)(2)(xiv).
 - 2) The records in 40 CFR 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.
 - 3) Records of performance tests, design, and performance evaluations as required in 40 CFR 63.10(b)(2).
- K. The permittee shall keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Table 3.
- L. The permittee shall keep a certified statement of compliance with the applicable work practice requirements in Table 4.
- 40 CFR 63.5915
- M. All applicable records must be maintained in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1).
- N. As specified in 40 CFR 63.10(b)(1), each record must be kept for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- O. Each record must be kept onsite for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR 63.10(b)(1). The records can be kept offsite for the remaining three years.
- P. Records may be kept in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.
- 40 CFR 63.5920

Other Requirements

Table 15 of 40 CFR 63 Subpart WWW shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 are applicable.

- 40 CFR 63.5925

III. Emission Point-Specific Conditions

Facility Name: Bertch Cabinet Manufacturing/ Oasis Facility
Permit Number: **03-TV-026**

Emission Point ID Numbers: See Table: Gel Coat Booths

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Gel Coat Booths
Emissions Control Equipment ID Numbers: See Table: Gel Coat Booths
Emissions Control Equipment Description: See Table: Gel Coat Booths

Applicable Requirements

Table: Gel Coat Booths

Emission Point Number	Emission Unit Number	Emission Unit Description	Control Equipment Number	Control Equipment Description	Raw Material/ Fuel	Rated Capacity (lbs./hr)
EP-OAS-001	EU-OAS-001	Gel Coat Booth	CE-OAS-001	Dry Filters	Styrene Gel Coat	71.2
EP-OAS-006	EU-OAS-008	Gel Coat Booth	CE-OAS-002	Dry Filters	Styrene Gel Coat	71.2

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from these emission points shall not exceed the following specified levels.

Pollutant: Opacity

Emission Limit(s): 40%⁽¹⁾

Authority for Requirement: Iowa DNR Construction Permits 90-A-167-S3 (OAS-001) and 94-A-428-S2 (OAS-006)
567 IAC 23.3(2)"d"

- ⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedance of the indicator opacity of (10%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. The permit holder shall also file an "indicator opacity exceedance report" with the DNR field office and keep records as required in the policy. If the exceedance continues after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter

Emission Limit(s): 0.01 gr./dscf,

Authority for Requirement: Iowa DNR Construction Permits 90-A-167-S3 (OAS-001) and
94-A-428-S2 (OAS-006)
567 IAC 23.4(13)

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput: (Limits for **each** booth)

1. The amount of catalyst used in this booth shall not exceed 12,545 pounds per twelve-month rolling period. The VOC content of the catalyst shall not exceed 90% by weight.
2. Amount of Gelcoat used in this booth shall not exceed 60,000 gallons per twelve-month rolling period. The density of any Gelcoat used shall not exceed 9.0 lbs/gallon.
3. The styrene content of the Gelcoat shall not exceed 40% by weight.
4. The methyl methacrylate (MMA) content of the Gelcoat shall not exceed 11% by weight.
5. Only one spray gun shall be operated in each booth at a time.

Control equipment parameters:

1. Filters shall be maintained and replaced according to manufacturer's recommendations.

Authority for Requirement: Iowa DNR Construction Permits 90-A-167-S3 (OAS-001) and
94-A-428-S2 (OAS-006)

Reporting & Record keeping: All records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The owner/operator shall maintain the following records:

1. Record the amount of catalyst used (in pounds) per twelve-month rolling period.
2. Record the amount of Gelcoat used (in gallons) per twelve-month rolling period.
3. Maintain MSDS sheets for all materials used in the booth.
4. Maintain a record of all maintenance and replacement of the filters.

Authority for Requirement: Iowa DNR Construction Permits 90-A-167-S3 (OAS-001) and
94-A-428-S2 (OAS-006)

NESHAP Requirements:

1. NESHAP requirements are contained in Part II Plant-Wide Conditions of this permit under NESHAP Limits and Requirements.

Authority for Requirement: 40 CFR 63 Subpart WWW

Emission Point Characteristics

Each emission point shall conform to the specifications listed below.

Stacks EP-OAS-001 and EP-OAS-006

Stack Height (feet): 30

Stack Diameter (inches): 34

Stack Exhaust Flow Rate (scfm): 15,400

Stack Temperature (°F): Ambient

Vertical, Unobstructed Discharge Required: Yes ☒ No ☐

Authority for Requirement: Iowa DNR Construction Permits 90-A-167-S3 (OAS-001) and
94-A-428-S2 (OAS-006)

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☒ No ☐

Relevant requirements of O & M plan for this equipment: Particulate Matter

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Spray Coating Dry Filter Operations & Maintenance Plan

Weekly

- Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.
- Maintain a written record of the observation and any action resulting from the inspection.

Record Keeping and Reporting

Maintenance and inspection records will be kept for five years and available upon request.

Quality Control

- The filter equipment will be operated and maintained according to the manufacturers recommendations.

Emission Point ID Numbers: See Table: See Table: Styrene Resin Tanks

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Styrene Resin Tanks

Applicable Requirements

Table: Styrene Resin Tanks

Emission Point Number	Emission Unit Number	Emission Unit Description	Raw Material/Fuel	Rated Capacity (gal)
EP-OAS-004	EU-OAS-006	Styrene Resin Storage Tank	Styrene Resin	5,880
EP-OAS-005	EU-OAS-007	Styrene Resin Storage Tank	Styrene Resin	5,880

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from these emission points shall not exceed the levels specified below.

Table: Styrene Resin Tanks-Emission Limits

Emission Point Number	Emission Unit Number	VOC Emission Limit		Construction Permit No.
		Lb./hr	Tons/yr	
EP-OAS-004	EU-OAS-006	0.022	0.095	94-A-431
EP-OAS-005	EU-OAS-007	0.022	0.095	94-A-432

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 0.022 lb./hr and 0.095 TPY

Authority for Requirement: Iowa DNR Construction Permits Specified in Table: Styrene Resin Tanks-Emission Limits

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

1. Capacity of each tank is 5,880 gal.
2. Maximum annual throughput for each tank is 1,649 TPY or 195,522 gal./yr.
3. Tanks may only store styrene resin (polyester pigment dispersion).

Authority for Requirement: Iowa DNR Construction Permits 94-A-431 and 94-A-432

NESHAP Requirements:

1. NESHAP requirements are contained in Part II Plant-Wide Conditions of this permit under NESHAP Limits and Requirements.

Authority for Requirement: 40 CFR 63 Subpart WWWW

Reporting & Record keeping: The following records must be stored onsite for a period of at least five (5) years:

1. Annual resin throughput on a 12-month rolling basis.

Authority for Requirement: Iowa DNR Construction Permits 94-A-431 and 94-A-432

Emission Point Characteristics

Each emission point shall conform to the specifications listed below.

Vents EP-OAS-004 and EP-OAS-005

Stack Height (feet): 16

Stack Diameter (inches): 3

Stack Exhaust Flow Rate (scfm): < 2

Stack Temperature (°F): Ambient

Vertical, Unobstructed Discharge Required: Yes ☐ No ☒

Authority for Requirement: Iowa DNR Construction Permit 94-A-431 (Vent EP-OAS-004)

Iowa DNR Construction Permit 94-A-432 (Vent EP-OAS-005)

It shall be the owner's responsibility to ensure that construction conforms with the emission point characteristics stated above. If it is determined that any of the emission point characteristics are different than stated above, the owner must notify the Department and obtain a construction permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Numbers: See Table: See Table: Resin Mixing and Casting

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Resin Mixing and Casting

Applicable Requirements

Table: Resin Mixing and Casting

Emission Point Number	Emission Unit Number	Emission Unit Description	Raw Material/Fuel	Rated Capacity (lb./hr)
EP-OAS-009	EU-OAS-003	Resin Mixing and Casting	Styrene Resin, Paste, and Catalyst	12.9
EP-OAS-010	EU-OAS-010	Resin Mixing and Casting	Styrene Resin, Paste, and Catalyst	12.9
EP-OAS-020	EU-OAS-020	Resin Mixing and Casting	Styrene Resin, Paste, and Catalyst	12.9

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from these emission points shall not exceed the levels specified below.

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 39.687 TPY ⁽¹⁾

Authority for Requirement: Iowa DNR Construction Permit 95-A-179

⁽¹⁾ Total emissions for all three sources.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput: Operation of this source shall not exceed the following limits:

1. Styrene monomer in the materials extruded is limited to 6.75 lb./gal.
2. Maximum amount of material extruded is 391,974 gal./yr.

NESHAP Requirements:

1. NESHAP requirements are contained in Part II Plant-Wide Conditions of this permit under NESHAP Limits and Requirements.

Authority for Requirement: 40 CFR 63 Subpart WWW

Reporting & Record keeping: The following records must be maintained onsite for at least five (5) years to indicate:

1. Record content of styrene monomer in the materials extruded in lb./gal.
2. Record monthly amount of material extruded in gal./mo.
3. During first 12 months of operation, record cumulative amount of material extruded each month of operation.
4. After first 12 months of operation, record 12-month rolling total amount of material extruded each month of operation in gal./yr.

Authority for Requirement: Iowa DNR Construction Permit 95-A-179

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Numbers: See Table: See Table: Mold Sealer

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Mold Sealer

Applicable Requirements

Table: Mold Sealer

Emission Point Number	Emission Unit Number	Emission Unit Description	Raw Material/Fuel	Rated Capacity (lb./hr)
EP-OAS-018	EU-OAS-018	Mold Sealer	Mold Sealer Paste	3.4
EP-OAS-019	EU-OAS-019	Mold Sealer	Mold Sealer Paste	3.4

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

There are no emission limits at this time.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

IV. General Conditions

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code chapter 22.

G1. Duty to Comply

1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. *567 IAC 22.108(9)"a"*
2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. *567 IAC 22.105 (2)"h"(3)*
3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. *567 IAC 22.108 (1)"b"*
4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. *567 IAC 22.108 (14)*
5. It shall not be a defense for a permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. *567 IAC 22.108 (9)"b"*

G2. Permit Expiration

1. Except as provided in 567 IAC 22.104, the expiration of this permit terminates the permittee's right to operate unless a timely and complete application has been submitted for renewal. Any testing required for renewal shall be completed before the application is submitted. *567 IAC 22.116(2)*
2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall present or mail the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, 7900 Hickman Rd, Suite #1, Urbandale, Iowa 50322, four or more copies of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. The definition of a complete application is as indicated in 567 IAC 22.105(2). *567 IAC 22.105*

G3. Certification Requirement for Title V Related Documents

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. *567 IAC 22.107 (4)*

G4. Annual Compliance Certification

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic

progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. *567 IAC 22.108 (15)"e"*

G5. Semi-Annual Monitoring Report

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 22.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. *567 IAC 22.108 (5)*

G6. Annual Fee

1. The permittee is required under subrule 567 IAC 22.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.

2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.

3. The following forms shall be submitted annually by March 31 documenting actual emissions for the previous calendar year.

- a. Form 1.0 "Facility Identification";
- b. Form 4.0 "Emissions unit-actual operations and emissions" for each emission unit;
- c. Form 5.0 "Title V annual emissions summary/fee"; and
- d. Part 3 "Application certification."

4. The fee shall be submitted annually by July 1. The fee shall be submitted with the following forms:

- a. Form 1.0 "Facility Identification";
- b. Form 5.0 "Title V annual emissions summary/fee";
- c. Part 3 "Application certification."

5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.

6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.

7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.

8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 22.115(1)"d".

G7. Inspection of Premises, Records, Equipment, Methods and Discharges

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. *567 IAC 22.108 (15)"b"*

G8. Duty to Provide Information

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. *567 IAC 22.108 (9)"e"*

G9. General Maintenance and Repair Duties

The owner or operator of any air emission source or control equipment shall:

1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
2. Remedy any cause of excess emissions in an expeditious manner.
3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. *567 IAC 24.2(1)*

G10. Recordkeeping Requirements for Compliance Monitoring

1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:

- a. The date, place and time of sampling or measurements
 - b. The date the analyses were performed.
 - c. The company or entity that performed the analyses.
 - d. The analytical techniques or methods used.
 - e. The results of such analyses; and
 - f. The operating conditions as existing at the time of sampling or measurement.
 - g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)
2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.
3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:

- a. Comply with all terms and conditions of this permit specific to each alternative scenario.
- b. Maintain a log at the permitted facility of the scenario under which it is operating.
- c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. *567 IAC 22.108(4), 567 IAC 22.108(12)*

G11. Evidence used in establishing that a violation has or is occurring.

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein.

1. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:

- a. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 22;
- b. Compliance test methods specified in 567 Chapter 25; or
- c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.

2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:

- a. Any monitoring or testing methods provided in these rules; or
- b. Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule. *567 IAC 21.5(1)-567 IAC 21.5(2)*

G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. *567 IAC 22.108(6)*

G13. Hazardous Release

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 281-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in 567 IAC 131.2(2). *567 IAC Chapter 131-State Only*

G14. Excess Emissions and Excess Emissions Reporting Requirements

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control measures.

Determination of any subsequent enforcement action will be made following review of this report.

If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within

a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

2. Excess Emissions Reporting

a. Oral Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An oral report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1)) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable visible emission standard by more than 10 percent opacity. The oral report may be made in person or by telephone and shall include as a minimum the following:

- i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and expected duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps being taken to remedy the excess emission.
- vi. The steps being taken to limit the excess emission in the interim period.

b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required oral reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:

- i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.
- vi. The steps that were taken to limit the excess emission.
- vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. *567 IAC 24.1(1)-567 IAC 24.1(4)*

3. Emergency Defense for Excess Emissions. For the purposes of this permit, an “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall

not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The facility at the time was being properly operated;
- c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and
- d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. *567 IAC 22.108(16)*

G15. Permit Deviation Reporting Requirements

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). *567 IAC 22.108(5)"b"*

G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. *567 IAC 23.1(2), 567 IAC 23.1(3), 567 IAC 23.1(4)*

G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification

1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:

- a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 22.
- b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);
- c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
- d. The changes are not subject to any requirement under Title IV of the Act.
- e. The changes comply with all applicable requirements.
- f. For such a change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:

- i. A brief description of the change within the permitted facility,
 - ii. The date on which the change will occur,
 - iii. Any change in emission as a result of that change,
 - iv. The pollutants emitted subject to the emissions trade
 - v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.
 - vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
 - vii. Any permit term or condition no longer applicable as a result of the change.
- 567 IAC 22.110(1)*

2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. *567 IAC 22.110(2)*

3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 22.110(1). *567 IAC 22.110(3)*

4. The permit shield provided in subrule 22.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. *567 IAC 22.110(4)*

5. Aggregate Insignificant Emissions. The permittee shall not construct, establish or operate any new insignificant activities or modify any existing insignificant activities in such a way that the emissions from these activities no longer meet the criteria of aggregate insignificant emissions. If the aggregate insignificant emissions are expected to be exceeded, the permittee shall submit the appropriate permit modification and receive approval prior to making any change. *567 IAC 22.103(2)*

6. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. *567 IAC 22.108(11)*

G18. Duty to Modify a Title V Permit

1. Administrative Amendment.

a. An administrative permit amendment is a permit revision that is required to do any of the following:

- i. Correct typographical errors
- ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source;
- iii. Require more frequent monitoring or reporting by the permittee; or
- iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.

- b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.
 - c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.
2. Minor Permit Modification.
- a. Minor permit modification procedures may be used only for those permit modifications that do any of the following:
 - i. Do not violate any applicable requirements
 - ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit.
 - iii. Do not require or change a case by case determination of an emission limitation or other standard, or increment analysis.
 - iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act.;
 - v. Are not modifications under any provision of Title I of the Act; and
 - vi. Are not required to be processed as significant modification.
 - b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:
 - i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs.
 - ii. The permittee's suggested draft permit
 - iii. Certification by a responsible official, pursuant to 567 IAC 22.107(4), that the proposed modification meets the criteria for use of a minor permit modification procedures and a request that such procedures be used; and
 - iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 22.107(7).
 - c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 22.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, existing permit term terms and conditions it seeks to modify may subject the facility to enforcement action.
3. Significant Permit Modification. Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant

Title V modifications shall meet all requirements of 567 IAC Chapter 22, including those for applications, public participation, review by affected states, and review by the administrator, and those requirements that apply to Title V issuance and renewal. *567 IAC 22.111-567 IAC 22.113* The permittee shall submit an application for a significant permit modification not later than three months after commencing operation of the changed source unless the existing Title V permit would prohibit such construction or change in operation, in which event the operation of the changed source may not commence until the department revises the permit. *567 IAC 22.105(1)"a"(4)*

G19. Duty to Obtain Construction Permits

Unless exempted under 567 IAC 22.1(2), the permittee must not construct, install, reconstruct, or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, conditional permit, or permit pursuant to 567 IAC 22.8, or permits required pursuant to 567 IAC 22.4 and 567 IAC 22.5. Such permits shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source. *567 IAC 22.1(1)*

G20. Asbestos

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when conducting any renovation or demolition activities at the facility. *567 IAC 23.1(3)"a", and 567 IAC 23.2*

G21. Open Burning

The permittee is prohibited from conducting open burning, except as may be allowed by 567 IAC 23.2. *567 IAC 23.2 except 23.2(3)"h"; 567 IAC 23.2(3)"h" - State Only*

G22. Acid Rain (Title IV) Emissions Allowances

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. *567 IAC 22.108(7)*

G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.

b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.

c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.

d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.

2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.

- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.
3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
 4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,
 5. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *40 CFR part 82*

G24. Permit Reopenings

1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. *567 IAC 22.108(9)"c"*
2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as practicable, but not later than 18 months after the promulgation of such standards and regulations.
 - a. Reopening and revision on this ground is not required if the permit has a remaining term of less than three years;

- b. Reopening and revision on this ground is not required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to June 25, 1993.
 - c. Reopening and revision on this ground is not required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. *567 IAC 22.108(17)"a", 567 IAC 22.108(17)"b"*
3. A permit shall be reopened and revised under any of the following circumstances:
- a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to June 25, 1993, provided that the reopening may be stayed pending judicial review of that determination;
 - b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Title V permit;
 - c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.
 - d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
 - e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements. *567 IAC 22.114(1)*
4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. *567 IAC 22.114(2)*

G25. Permit Shield

Compliance with the conditions of this permit shall be deemed compliance with the applicable requirements included in this permit as of the date of permit issuance.

This permit shield shall not alter or affect the following:

- 1. The provisions of section 303 of the Act (emergency orders), including the authority of the administrator under that section;
- 2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- 3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Act;
- 4. The ability of the department or the administrator to obtain information from the facility pursuant to section 114 of the Act. *567 IAC 22.108 (18)*

G26. Severability

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. *567 IAC 22.108 (8)*

G27. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. *567 IAC 22.108 (9)"d"*

G28. Transferability

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought to determine transferability of the permit. *567 IAC 22.111 (1)"d"*

G29. Disclaimer

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. *567 IAC 22.3(3)"c"*

G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification

The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with an applicable requirement. For the department to consider test results a valid demonstration of compliance with applicable rules or a permit condition, such notice shall be given. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. Unless specifically waived by the department's stack test contact, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. The department may accept a testing protocol in lieu of a pretest meeting. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator
Iowa DNR, Air Quality Bureau
7900 Hickman Road, Suite #1
Urbandale, IA 50322
(515) 242-6001

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program.

567 IAC 25.1(7)"a", 567 IAC 25.1(9)

G31. Prevention of Air Pollution Emergency Episodes

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons. 567 IAC 26.1(1)

G32. Contacts List

The current address and phone number for reports and notifications to the EPA administrator is:

Chief of Air Permits
EPA Region 7
Air Permits and Compliance Branch
901 N. 5th Street
Kansas City, KS 66101
(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite #1
Urbandale, IA 50322
(515) 242-5100

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

Field Office 1

909 West Main – Suite 4
Manchester, IA 52057
(563) 927-2640

Field Office 2

P.O. Box 1443
2300-15th St., SW
Mason City, IA 50401
(641) 424-4073

Field Office 3

1900 N. Grand Ave.
Spencer, IA 51301
(712) 262-4177

Field Office 4

1401 Sunnyside Lane
Atlantic, IA 50022
(712) 243-1934

Field Office 5

401 SW 7th Street, Suite I
Des Moines, IA 50309
(515) 725-0268

Field Office 6

1004 W. Madison
Washington, IA 52353
(319) 653-2135

Polk County Public Health Dept.

Air Quality Division
5885 NE 14th St.
Des Moines, IA 50313
(515) 286-3351

Linn County Public Health Dept.

Air Pollution Control Division
501 13th St., NW
Cedar Rapids, IA 52405
(319) 892-6000

Appendix A: NESHAP Requirements Tables

Table 1: Relevant Portions of Table 1 to Subpart WWW of Part 63-Equations To Calculate Organic HAP Emissions Factors For Specific Open Molding And Centrifugal Casting Process Streams

If your operation type is a new or existing...	And you use...	With...	Use this organic HAP Emissions Factor (EF) Equation for materials with less than 33 percent organic HAP (19 percent organic HAP for nonatomized gel coat) ^{1,2}	Use this organic HAP Emissions Factor (EF) Equation for materials with 33 percent or more organic HAP (19 percent organic HAP for nonatomized gel coat) ^{1,2}
1. Open molding operation...	f. Atomized spray gel coat application	Nonvapor-suppressed gel coat.	$EF = 0.446 \times \%HAP \times 2000$	$EF = ((1.03646 \times \%HAP) - 0.195) \times 2000$
	g. Nonatomized spray gel coat application	Nonvapor-suppressed gel coat.	$EF = 0.185 \times \%HAP \times 2000$	$EF = ((0.4506 \times \%HAP) - 0.505) \times 2000$
	h. Manual gel coat application ³	Nonvapor-suppressed gel coat.	$EF = 0.126 \times \%HAP \times 2000$ (for emissions estimation only, see footnote 3)	$EF = ((0.286 \times \%HAP) - 0.529) \times 2000$ (for emissions estimation only, see footnote 3)

¹To obtain the organic HAP emissions factor value for an operation with an add-on control device multiply the EF above by the add-on control factor calculated using Equation 1 of Operational Limits and Requirements Options for meeting standards under Plant Wide Conditions. The organic HAP emissions factors have units of lbs of organic HAP per ton of resin or gel coat applied.

²Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, *i.e.* 33 percent HAP should be input as 0.33, not 33.

³Do not use this equation for determining compliance with emission limits in Table 3, Appendix A. To determine compliance with emission limits you must treat all gel coat as if it were applied as part of your gel coat spray application operations. If gel coat is applied by manual techniques only, the gel coat must be treated as if it were applied with atomized spray and use Equation 1f to determine compliance with the appropriate emission limits in Table 3, Appendix A. To estimate emissions from manually applied gel coat, the gel coat quantities applied manually may be included with the quantities applied using spray, or this equation may be used to estimate emissions from the portion of gel coat applied manually.

Table 3: Gel Coat Section of Table 3 To Subpart WWW of Part 63-Organic HAP Emissions Limits For Existing Open Molding Sources, New Open Molding Sources Emitting Less Than 100 TPY of HAP, and New and Existing Centrifugal Casting and Continuous Lamination/Casting Sources That Emit Less Than 100 TPY of HAP

If your operation type is	And you use	Your organic HAP emissions limit is ¹	And the highest organic HAP content for a compliant resin or gel coat is ²
Open molding – gel coat ³	a. Tooling gel coating	437 lb./ton	40.0
	b. White/off white pigmented gel coating	267 lb./ton	30.0
	c. All other pigmented gel coating	377 lb./ton	37.0
	d. CR/HS or high performance gel coat	605 lb./ton	48.0
	e. Fire retardant gel coat	854 lb./ton	60.0
	f. Clear production gel coat	522 lb./ton	44.0

¹ Organic HAP emissions limits for open molding and centrifugal casting are expressed as lb./ton. You must be at or below these values based on a 12-month rolling average.

² A compliant resin or gel coat means that if its organic HAP content is used to calculate an organic HAP emissions factor, the factor calculated does not exceed the appropriate organic HAP emissions limit shown in the table.

³ These limits are for spray application of gel coat. Manual gel coat application must be included as part of spray gel coat application for compliance purposes using the same organic HAP emissions factor equation and organic HAP emissions limit. If you only apply gel coat with manual application, treat the manually applied gel coat as if it were applied with atomized spray for compliance determinations.

Table 4: Relevant Portions of Table 4 to Subpart WWW of Part 63-Work Practice Standards

For...	You must...
1. A new or existing closed molding operation using compression/injecting molding	Uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.
2. A new or existing cleaning operation	Not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
3. A new or existing materials HAP-containing materials storage operation.	Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
4. An existing or new mixing or BMC manufacturing operation.	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
5. An existing mixing or BMC manufacturing operation	Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety.
6. A new or existing mixing or BMC manufacturing operation ¹ .	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

¹ Containers of 5 gallons or less may be open when active mixing is taking place or during periods when they are in process (*i.e.* they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of 500 square inches or less may be open while active mixing is taking place.

Table 8: Relevant portions of Table 8 to Subpart WWWW of Part 63-Initial Compliance With Organic HAP Emission Limits

For...	That must meet the following organic HAP emissions limit...	You have demonstrated initial compliance if...
1. Open molding and centrifugal casting operations.	a. An organic HAP emissions limit shown in Table 3 of Appendix A.	<p>i. You have met the appropriate organic HAP emissions limits for these operations as calculated on a 12-month rolling average year using the procedures listed under <u>Options for meeting standards</u> under NESHAP Limits and Requirements, Plant Wide Conditions, or</p> <p>ii. You demonstrate by using the appropriate values in Table 3 of Appendix A that all gel coats considered individually meet the appropriate organic HAP contents.</p>

Table 9: Relevant portions of Table 9 to Subpart WWW of Part 63-Initial Compliance With Work Practice Standards

For...	That must meet the following standard...	You have demonstrated compliance if...
1. A new or existing closed molding operation using compression/injecting molding	Uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.	The owner/operator submits a certified statement in the notice of compliance status that only one charge is uncovered, unwrapped, or exposed per mold cycle per compression/injection molding machine, or prior to the loader, hoppers are closed except when adding materials, and materials are recovered after slitting.
2. A new or existing cleaning operation	Not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.	The owner/operator submits a certified statement in the notice of compliance status that all cleaning materials, except styrene contained in closed systems, or materials used to clean cured resin from application equipment contain no HAP.
3. A new or existing materials HAP-containing materials storage operation.	Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.	The owner/operator submits a certified statement in the notice of compliance status that all HAP-containing storage containers are kept closed or covered except when adding or removing materials, and that any bulk storage tanks are vented only as necessary for safety.
4. An existing or new mixing or BMC manufacturing operation.	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.	The owner/operator submits a certified statement in the notice of compliance status that mixers are not actively vented to the atmosphere when the agitator is turning, except when adding materials or as necessary for safety.
5. An existing mixing or BMC manufacturing operation	Not actively vent mixers to the atmosphere while the mixing agitator is turning, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety.	The owner/operator submits a certified statement in the notice of compliance status that mixers are not actively vented to the atmosphere when the agitator is turning, except when adding materials or as necessary for safety.

Table 9: Relevant portions of Table 9 to Subpart WWWW of Part 63-Initial Compliance With Work Practice Standards (Cont.)

For...	That must meet the following standard...	You have demonstrated compliance if...
6. A new or existing mixing or BMC manufacturing operation.	Keep the mixer covers closed during mixing except when adding materials to the mixing vessels.	The owner/operator submits a certified statement in the notice of compliance status that mixers are closed except when adding materials to the mixing vessels.

Appendix B: Iowa DNR Air Quality Policy 3-b-08

1998 NOV 13 4

IOWA DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

POLICY/PROCEDURE STATEMENT

TOPIC: <u>Opacity Limits</u>

Policy Procedure Number: 3-b-08

Replaces Number: None

Date:

Effective Date: November 12, 1998

Preparer: David Phelps

Reviewer:

Approval: **Bureau Chief:** Peter Hamlin

Date: 11/12/98

Division Administrator: Allan Stokes

Date: 11/12/98

Applicable Code of Iowa or Iowa Administrative Code Rule: 23.3(2)d

“No person shall allow, cause or permit the emission of visible air contaminants into the atmosphere from any equipment, internal combustion engine, premise fire, open fire or stack, equal to or in excess of 40 percent opacity or that level specified in a construction permit, except as provided below and in 567-Chapter 24.”

REASON OR BACKGROUND

The default opacity limit allowed by regulation is 40%. This limit was established with the original regulations in 1970. It is generally accepted that opacity greater than 40% was evidence of a mass emission standard exceedence. More recently, there have been requests from facilities for limits much lower than that allowed by the regulations, in some cases less than 0.01 gr/scf to which a 40% opacity limit does not correspond. Since opacity is used as an indicator of the particulate emission rate, listing an indicated potential problem opacity that is more in line with the mass emission rate is useful. In order to have the authority to set limits lower than 40%, subrule 23.3(2)d was changed. This change allows the department the ability to set opacity limits at a level that more closely corresponds to what would be observed by the source when operating in compliance with its mass emission rate.

Except in the case where a specific opacity limit is established by rule, it has been the general policy of the Department not to take action on opacity limits directly. Rather, if it is felt that a violation of the mass emission rate exists that is not attributable to some abnormal event, a stack test would be required to verify compliance. However, the Department reserves the right to use the results of formal opacity readings as evidence of an exceedence.

DETAILS

It shall be the policy of the Department to list the default opacity as a permit condition and in addition an indicator opacity may be listed.

For ease of proving continual compliance a source may request a 'no visible emissions' opacity limit which allows proof of compliance without having a certified opacity reading taken. In this case any visible emissions would be an exceedence.

The IDNR permit writer may list an opacity that will be a indicator of possible mass emission rate exceedence. If the permittee wishes, the recommended indicator opacity may be changed by demonstrating compliance with the mass emission rate during a stack test while emitting the new desired indicator opacity. If the tested mass emission rate is less than the permitted emission rate, then the desired indicator opacity may be set at a proportionally higher level than observed during the stack test.

If an opacity measurement, taken in accordance with an approved reference method for opacity, (generally USEPA Method 9 or 22) exceeds the indicator opacity then the facility will promptly investigate the source and make corrections. However, if after corrections are made the opacity continues to exceed the indicator opacity the Department may require additional proof to demonstrate compliance with the mass emissions limits.

Recommended indicator opacities shall be:

Grain Loading gr./scf	Recommended Indicator Opacity
<0.01 gr./scf	non specified in permit *
0.01 to 0.06 gr./scf	10% Opacity
0.061 to 0.08 gr./scf	20% Opacity
0.081 to 0.1 gr./scf	25% Opacity

* A line is added to the permit that states: "If visible emissions are observed other than start-up, shut-down, or malfunction, a stack test may be required to demonstrate compliance with the particulate standard."

If a source is a batch process the indicator opacity shall be based on the table above, but the opacity averaging period, for comparison to the indicator opacity, shall be the entire batch cycle. For purposes of comparison the indicator opacity readings shall be taken during the entire cycle and averaged.

Sources are also given the opportunity to set source specific limits to be coordinated with the initial compliance test. These may then be incorporated into the permit.

In all cases an exceedence of the indicator opacity will require the permittee to file an "indicator opacity exceedence report" to the IDNR regional office. The reporting requirements shall be:

Oral report of excess indicator opacity. An incident of excess indicator opacity (other than an incident of excess indicator opacity during a period of startup, shutdown, or cleaning) shall be reported to the appropriate regional office of the department within eight hours of, or at the start of the first working day following the onset of the of the incident. The reporting exemption for an incident of excess indicator opacity during startup and shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in subrule 25.1(6).

An oral report of excess indicator opacity is not required for a source with operational continuous monitoring equipment (as specified in subrule 25.1(1) if the incident of excess indicator opacity continues for less than 30 minutes and does not exceed the applicable visible emission standard by more than 10 percent opacity.

The oral report may be made in person or by telephone and shall include as a minimum the following:

- a) The identity of the equipment or source operation from which the excess indicator opacity originated and the associated stack or emission point.
- b) The estimated quantity of the excess indicator opacity.
- c) The time and expected duration of the excess indicator opacity.
- d) The cause of the excess indicator opacity.
- e) The steps being taken to remedy the excess indicator opacity.
- f) The steps being taken to limit the excess indicator opacity in the interim period.

Written report of excess indicator opacity. A written report of an incident of excess indicator opacity shall be submitted as a follow-up to all required oral reports to the department within seven (7) days of the onset of the upset condition, and shall include as a minimum the following:

- a) The identity of the equipment or source operation point from which the excess emission originate and the associated stack or emission point.
- b) The estimated quantity of the excess indicator opacity.
- c) The time and duration of the excess indicator opacity.
- d) The cause of the excess indicator opacity.
- e) The steps that were taken to remedy and to prevent the recurrence of the incident of excess indicator opacity.
- f) The steps that were taken to limit the excess indicator opacity.
- g) If the owner claims that the excess indicator opacity was due to malfunction, documentation to support this claim.

Exceptions to this policy:

- 1) In the case where a facility has an opacity limit established in an existing permit, no change will be made to that permit limit unless the permit is being modified for other purposes.
- 2) If the facility has a continuous opacity monitor, this policy shall not apply.
- 3) This policy shall not apply to opacity limits established in Prevention of Significant Deterioration (PSD) permits or permits that were established for maintenance plans for nonattainment areas.
- 4) This policy shall not apply where an opacity limit is established as an indication of hazardous air pollutants.

- 5) This policy shall not apply where an opacity limit is established by a rule, New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAPS), etc.